EXHIBIT A

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11	UNITED STATES DISTRICT COURT	
12	NORTHERN DISTRICT OF CALIFORNIA	
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14	UNITED STATES OF AMERICA,	Case No.: 3:18-cr-00577-CRB
15	Plaintiff,	Judge: Hon. Charles Breyer
16	VS.	DECLARATION OF DAVID TINDLE IN
17	MICHAEL RICHARD LYNCH and	SUPPORT OF MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE
18	STEPHEN KEITH CHAMBERLAIN,	CONDITIONS OF TRETRING RELEASE
19	Defendants.	
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DECLARATION OF DAVID TINDLE IN SUPPORT MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

- I, David Tindle declare as follows:
- I am the Global Operations Manager at Keelson Strategic Corporation
 ("Keelson"), the private security firm that is providing 24-hour armed security to oversee Dr.
 Lynch's compliance with the conditions imposed by the Court and Pretrial Services.
- 2. I have three decades of experience in the private security industry. Prior to that, I spent 12 years in the Parachute Regiment of the British Army.
- 3. I am responsible for day to day management of the security team that is overseeing Dr. Lynch's compliance with the Court's release conditions, am in daily contact with the officers who are supervising Dr. Lynch and in at least weekly contact with Kim Do of Pretrial Services.
- 4. Since Keelson began supervising Dr. Lynch in May 2023, Dr. Lynch has been fully compliant with all terms and conditions of his release, including confinement to his home in San Francisco and obtaining pre-approval from U.S. Pretrial Services for all approved movements.
- 5. Since Keelson Strategic began supervising Dr. Lynch in May 2023, there has not been a single violation of his conditions nor any cause for concern. Dr. Lynch has been a model supervisee.
- 6. On several occasions, the Court has temporarily modified Dr. Lynch's bond conditions to permit him to leave his residence from 9:00 am to 9:00 pm. On each of those occasions, Dr. Lynch has been fully compliant with the modified conditions, never once being late or causing any issue. Those temporary modification periods covered the following dates:
 - a. July 10-17, 2023
 - b. Aug. 9-26, 2023
 - c. Sept. 24 Oct. 9, 2023
 - d. Oct. 24 Nov. 5, 2023

- 7. During each of these periods of modified release, Keelson has monitored Dr. Lynch at all times, including having two armed security officers travel with him at all times.
- 8. I am confident that the current request to modify Dr. Lynch's release conditions to permit him to travel within San Francisco from 9:00 am to 9:00 pm will not create any difficulties for Keelson's monitoring of Dr. Lynch, nor any risks of flight by Dr. Lynch.
- 9. Keelson agents—including some of whom are retired officers from the San Francisco Police Department, California Highway Patrol, U.S. Army Special Forces and U.S. Marine Corps—are fully able to monitor Dr. Lynch at all times subject to the release as may be modified by this request and handle any risk of noncompliance.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed November 14, 2023, in Garden Grove, California.

David Tindle